

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

KATERRA INC., *et al.*¹

Debtors.

)
)
) Chapter 11

)
) Case No. 21-31861 (DRJ)

)
) (Joint Administration Requested)
)

**NOTICE OF APPEARANCE AND REQUEST
FOR SERVICE OF NOTICES AND DOCUMENTS**

PLEASE TAKE NOTICE that the undersigned appears as counsel to Greensill Limited (in liquidation) acting by its joint liquidators, Andrew Charters and Sarah O'Toole of Grant Thornton UK LLP of 30 Finsbury Square, London, UK EC2A 1AG ("Greensill Limited (in liquidation)"), a creditor herein, and pursuant to 11 U.S.C. § 1109(b) and Federal Rules of Bankruptcy Procedure 2002 and 9010(b), hereby requests that all notices given or required to be given in this case be given and served upon:

Ryan C. Wooten
State Bar No. 24075308
S.D. Tex. Bar No. 1259974
ORRICK, HERRINGTON & SUTCLIFFE LLP
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and

Raniero D'Aversa (*pro hac vice admission pending*)

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' proposed claims and noticing agent at <https://cases.primeclerk.com/katerra>. The location of Debtor Katerra, Inc.'s principal place of business and the Debtors' service address in these chapter 11 cases is 2700 Post Oak Boulevard, Suite 2450, Houston, Texas 77056.

New York State Bar No. 2381473
Evan C. Hollander (*pro hac vice admission pending*)
New York State Bar No. 2216976
ORRICK, HERRINGTON & SUTCLIFFE LLP
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PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only the notices and papers referred to in the Federal Rules of Bankruptcy Procedure specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether written or oral, formal or informal, and whether transmitted or conveyed by mail, hand delivery, facsimile transmission, e-mail, telephone, telegraph, telex or otherwise, which affects the above-captioned Debtors (the “Debtors”) or the property of or in the possession, custody or control of the Debtors or which is otherwise filed or given with regard to the above-referenced case.

PLEASE TAKE FURTHER NOTICE that neither this notice nor any later appearance, pleading, claim, or suit shall waive any right (1) to have final orders in non-core matters entered only after *de novo* review by a District Judge, (2) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, or (3) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and Request for Service of Notices and Documents is without prejudice to Greensill Limited’s (in liquidation) rights, remedies, claims, actions, defenses, setoffs, or recoupments, in law or in equity, against the Debtors and any other entities either in this case or in any other action, all of which rights, remedies, claims, actions, defenses, setoffs and recoupments are expressly reserved.

PLEASE TAKE FURTHER NOTICE that pursuant to Federal Rule of Bankruptcy Procedure 3017(a), Greensill Limited (in liquidation) further requests that all plans and disclosure statements filed herein by any party be duly served upon Greensill Limited's (in liquidation) undersigned counsel.

Dated: August 9, 2021

ORRICK, HERRINGTON & SUTCLIFFE LLP

By: /s/ Ryan C. Wooten

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Counsel to Greensill Limited (in liquidation) acting by its joint liquidators, Andrew Charters and Sarah O'Toole of Grant Thornton UK LLP of 30 Finsbury Square, London, UK EC2A 1AG

CERTIFICATE OF SERVICE

This will certify that a true and correct copy of the foregoing document was forwarded by electronic transmission to all registered ECF users appearing in the case on August __, 2021.

/s/ Ryan C. Wooten
Ryan C. Wooten